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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**STIPULATION TO EXTEND THE DISCOVERY AND  
CASE MANAGEMENT DEADLINES BY 60 DAYS  
[SECOND REQUEST]**

18        This stipulation is filed pursuant to LR IA 6-1 and LR IA 6-2. It *has* been filed pursuant  
19 to local rule 26-3 with regard to the discovery deadline. Local rule 26-3 requires any request to  
20 extend a discovery or case management deadline be received no later than twenty-one (21) days  
21 prior to the expiration of the subject deadline. The parties are not requesting extensions to the  
22 case management deadlines pertaining to amendment of pleadings and designations of experts.  
23 On April 27, 2021 this Honorable Court adopted the parties' initial Stipulated Discovery Plan  
24 and Scheduling Order which provided for a discovery deadline of October 12, 2021 [#21]. On  
25 August 13, 2021 this Honorable Court approved the parties Stipulation extending the discovery  
26 deadline through January 12, 2022 [#32].

1       The parties are discussing settlement and there is a possibility this action can be  
2 concluded without first engaging in costly time consuming Depositions. Plaintiff has served  
3 both initial written discovery and initial disclosures.

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5       Accordingly, the parties request adoption of the following deadlines:

- 6       1.      Last date to complete discovery: March 14, 2022  
7       2.      Last date to file dispositive Motions: April 12, 2022  
8       3.      Last date to file Joint Pretrial Order: May 12, 2022 or thirty (30) days after  
9 decision deciding dispositive motion.

10      DATED: November 8, 2021

11      MITCHELL D. GLINER, ESQ.

BALLARD SPAHR LLP

13      */s/ Mitchell Gliner*

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16      Attorneys for Defendant

19      IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

22      DATED: November 10, 2021 —